

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
NOV 14 2018

UNITED STATES OF AMERICA

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SEALED BY
DEPUTY _____

v.

NO. 6:18-CR-70
JUDGE RG/JDL

DANIEL WAYNE LITTLE, II

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about December 4, 2016, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 2

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about January 1, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 3

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about January 18, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 4

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about January 19, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 5

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about January 21, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 6

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about January 23, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 7

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about March 11, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 8

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about March 17, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 9

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about April 1, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 10

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about April 9, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 11

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about July 24, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 12

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about August 7, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

COUNT 13

Violation: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

On or about October 18, 2017, in the Eastern District of Texas, and elsewhere, the defendant, **Daniel Wayne Little, II**, used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense, namely a criminal offense under federal law, Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

All in violation of 18 U.S.C. § 2422(b).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 2428

1. The allegations contained in Counts 1 through 13 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

2. Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of 18 U.S.C. § 2422(b), the defendant, **Daniel Wayne Little, II**, shall forfeit to the United States of America:

- a. Any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and
- b. Any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2428.

4. By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 2428.

All pursuant to 18 U.S.C. § 2428 and the procedures set forth at 21 U.S.C. § 853, as made applicable through 18 U.S.C. § 2428.

A TRUE BILL



GRAND JURY FOREPERSON

11-14-18

Date

JOSEPH D. BROWN
UNITED STATES ATTORNEY



NATHANIEL C. KUMMERFELD
ASSISTANT UNITED STATES ATTORNEY

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DANIEL WAYNE LITTLE, II

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JUDGE _____

NOTICE OF PENALTY

COUNTS 1 - 13

VIOLATION: 18 U.S.C. § 2422(b)
Coercion and Enticement

PENALTY: Imprisonment of not less than ten (10) years nor more than
life and a fine of \$250,000 to be followed by a term of
supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 each count